

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MASSACHUSETTS

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CLEMENT WOGHIREN,  
Plaintiff,

v.

WYETH and WYETH BIOPHARMA,  
Defendants.

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CIVIL ACTION NO. 04-12148 WGY

**JOINT TRIAL EXHIBIT LIST  
ANTICIPATED CONTESTED EXHIBITS**

<b>Doc. No.</b>	<b>Document Description</b>	<b>Doc Date</b>	<b>Basis</b>
A.	QC Raw Materials Manager Job Description (S. Bossi)		Relevance
B.	S. Bossi Employee Record Card		Relevance
C.	J. Flynn Employee Record Card		Relevance
D.	J. Magazzu Employee Record Card		Relevance
E.	R. Thompson Employee Record Card		Relevance
F.	T. O'Brien Employee Record Card		Relevance
G.	Zinma Khaw Memos and Exit Interview Questionnaire	June 2000	Hearsay; unfairly prejudicial
H.	Clement Woghiren Candidate Evaluation authored by S. Abrams	08/16/02	Multiple Hearsay only
I.	Denise Maratea's Notes dated January – June 2004		Hearsay; unfairly prejudicial
J.	David Holmes' memo to Denise Maratea	01/21/04	Hearsay; unfairly prejudicial
K.	Sharleen Miele memo to Denise Maratea	01/27/04	Hearsay; unfairly prejudicial
L.	Performance Improvement Program ("PIP")	04/22/04	Multiple Hearsay only
M.	D. Maratea Post-PIP Notes dated April – September 2004		Hearsay; unfairly prejudicial
N.	Chris Pajak's memo to Mike Dougherty re: his concurrence with Denise Maratea's decision to terminate Clement Woghiren	09/22/04	Hearsay; unfairly prejudicial

O.	Current Organizational Charts for QC Laboratories	2005	Foundation, relevance, never produced or alluded to in discovery
P.	QC AS&T Group by Ethnic Backgrounds (Current)	09/05	Foundation, relevance, never produced or alluded to in discovery

All objections are those of the plaintiff.

Respectfully submitted,  
**CLEMENT WOGHIREN**  
 By His attorney:

Respectfully Submitted,  
**WYETH and WYETH BIOPHARMA**  
 By Their Attorneys:

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Date: September 26, 2005